

T.E.S. FILER CITY STATION

March 27, 2015

Attn: Compliance Tracker, AE-1 7J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Via U.S. Certified Mail, Return Receipt Requested

and

Via e-mail: cullen.raymond@epa.gov, cantello.nicole@epa.gov and r5enforcement@epa.gov

**Re: Request to Provide Information Pursuant to the Clean Air Act
TES Filer City Station
10 Day Certification Regarding Compliance**

To Whom It May Concern:

TES Filer City Station ("Filer") received a Request to Provide Information Pursuant to the Clean Air Act (the "Request") on March 18, 2015 from the U.S. Environmental Protection Agency ("EPA"). The Preamble of Appendix B of the Request seeks a certification within 10 days of receipt of Filer's intent to comply with the Request. This letter meets that deadline and our intent is to comply with the Request, but we are requesting an additional 30 days to gather all the information, hire a consultant and map potential monitor locations as detailed below.

After a thorough review of the voluminous and extensive documentation requested (Appendix B, items 1 through 4) and the lengthy and expensive activities necessary to site, install, maintain and provide reporting of monitors (Appendix B, items 5 through 14 and items 20 through 24) and a meteorological tower (Appendix B, items 15 through 24), Filer states the following:

- Filer is located in Filer City, Michigan, a remote northwestern city in the State of Michigan's Lower Peninsula. Administrative support necessary to properly and expeditiously reply to this Request is located in Jackson, Michigan, some 220 miles away with a traveling distance of 3.5 hours.
- Some of the documentation requested is in paper copy in bound logbooks and needs to be properly scanned into an electronic format compatible to EPA's Request, Appendix A. Such scanning of bound documentation is a tedious and time consuming manual process.
- Responses to the various items need to be organized in a cohesive electronic format, as requested by EPA in Appendix A to the Request, and Bates Numbered in a logical

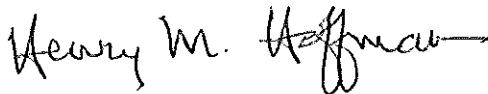
sequence to allow for EPA and Filer's ability to cross reference the information in the future.

- Filer does not have the technical expertise on staff to respond and provide the data requested in items 5 through 24 of the Request and Filer intends to hire a competent environmental consulting firm to assist with those items.
- In order to expedite responses for items 5 through 24, Filer intends to deviate from its standard business practice of seeking bid for such work and will sole source this task. Although eliminating the bid process will save time (and likely increase the costs for Filer to comply with this Request), the process of including a third party does take additional time.

Correspondence with Mr. Ray Cullin of EPA Region 5 this week helped to better characterize the granularity, and therefore the quantity, of the data needed to fulfill certain portions of the Request at this time. Based on the foregoing, Filer seeks additional time to fully comply with all the legal and reasonable items in the Request. Filer believes that it will be able to respond in 60 days from the date of receipt of the Request to those items the Request seeks in 30 days, to wit, items 1 through 6 of the Request. Please let Filer know immediately if this extension of time is acceptable. If the requested extension is not wholly acceptable, some items of the Request may be able to be produced on a rolling basis, with production at the 30 day mark.

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

Truly yours,



Henry M. Hoffman
General Manager

cc. Joe Tondu
Tom Allen
Scott Sinkwitts, Esq.
Jason Prentice